

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:)	Chapter 11
Stream TV Networks, Inc., <i>et</i>)	Bankruptcy No. 23-10763 (DJB)
<i>al.</i>)	
Debtors.)	

**OBJECTION OF RAJA RAJAN TO
AMENDMENT OF SCHEDULE E/F DISPUTING CLAIM NO. 3.109**

NOW COMES Raja Rajan (“Claimant”) , appearing pro se and for purposes of this limited objection, and respectfully objects to the July 30, 2025 amendment of Schedule E/F (Docket No. 1046) and the related notice (Docket No. 1048), which now classify his previously scheduled general unsecured claim (Claim No. 3.109 in the amount of \$3,807.60) as “disputed and subject to counterclaims or subordination.”

In support of this Objection, Mr. Rajan states as follows:

1. Background

- a) Mr. Rajan’s claim for \$3,807.60 arises from **wages earned during February 16–29, 2020**, while performing professional services for the Debtor.
- b) This amount was **previously scheduled by the Debtor itself** as a valid general unsecured claim in its original Schedules filed on March 29, 2023 (D.I. 54).
- c) The Debtor’s amendment (D.I. 1046) now recharacterizes the claim as "**disputed**," without **any factual basis**, supporting documentation, or contemporaneous objection.
- d) The Trustee sued Claimant along with many other defendants in an adversary action in this matter at William A. Homony...v. Rembrandt Holdings, Ltd. et. al, at Adv. No. 25-00138- (DJB) but the Trustee dismissed claimant from that suit voluntarily.[Adversary docket 29 and Court approval 30]

- e) Though the Trustee is not objecting to the numerous other claims of other creditors, he objects to the claims of Claimant and his brother Mathu Rajan.
- f) This objection's purpose is to object but also to seek expedited discovery on a limited basis for the objection.
- g) It appears the objection is not based on good faith but rather personal reasons that constitute the opposite of good faith.

2. The Claim Is Presumptively Valid

- a) The original schedules **included** this claim as undisputed.
- b) No objection under Rule 3007 or evidentiary motion has been filed to rebut the **presumption of validity** under Bankruptcy Rule 3001(f).
- c) Only an adversary proceeding has been filed against Claimant but has been voluntarily resolved.
- d) The Trustee has not filed a formal objection under § 502 of the Bankruptcy Code or provided **any explanation or evidence** supporting the "disputed" classification.
- e) The Trustee has not provided Claimant Official Form 420B (Notice of Objection to Claim) which requires notice to Claimant and an opportunity to request a hearing on the matter.

3. No Basis for Counterclaims or Subordination

- The vague references to "counterclaims or subordination" are **unsupported by any pleading** or legal theory.
- Mr. Rajan was a third-party professional service provider with **no officer or director role** in Stream TV and **no contractual liability** to the Debtor.

- There is **no basis for equitable subordination** under 11 U.S.C. § 510(c), which requires findings of **inequitable conduct, injury to creditors, and advantage to the claimant.**

4. Prejudice and Due Process Concerns

- a) Recharacterizing a valid and previously scheduled claim as “disputed” without any evidence violates due process.
- b) The amendment could improperly delay payment or reduce distributions to Mr. Rajan based on nothing more than Trustee speculation.

WHEREFORE, Mr. Rajan respectfully requests that the Court:

1. **Reject** the Trustee’s reclassification of Claim No. 3.109 as “disputed.”
2. Confirm the claim’s treatment as a valid, general unsecured claim in the amount of **\$3,807.60;**
3. If the Court does not, on its own initiative, make a finding that the claim remains valid, then grant an immediate deposition of the Trustee to obtain information regarding the propriety of the claim; and
4. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Dated: August 11, 2025

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Pro Se Claimant